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SARA KYLE, COMMISSIONER
TN REGULATORY AUTHORITY

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T.R.A. LOCKER ROOM

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June 9, 2003

Ms. Sara Kyle, Chairman
Tennessee Regulatory Authority
460 James Robertson Parkway
Nashville, TN 37243

RE: *Petition of Tennessee American Water Company to
Change and Increase Certain Rates and Charges so as to
Permit it to Earn a Fair and Adequate Rate of Return on
its Property used and Useful in Furnishing Water Service
to its Customers, Docket No. 03-00118.*

Dear Chairman Kyle:

Enclosed for filing is the original and 13 copies of the City of Chattanooga's Second Supplemental Response to Requests for Discovery Concerning Expert Witnesses From Tennessee-American Water Company.

Should you have any questions, please contact me.

Sincerely

Michael A. McMahan
Special Counsel

MAM/add

Enclosures

cc: Certificate of Service List

**BEFORE THE TENNESSEE REGULATORY AUTHORITY
NASHVILLE, TENNESSEE**

IN RE:

**PETITION OF TENNESSEE AMERICAN
WATER COMPANY TO CHANGE AND
INCREASE CERTAIN RATES AND
CHARGES SO AS TO PERMIT IT TO
EARN A FAIR AND ADEQUATE RATE
OF RETURN ON ITS PROPERTY USED
AND USEFUL IN FURNISHING WATER
SERVICE TO ITS CUSTOMERS**

Docket No. 03-00118

**CITY OF CHATTANOOGA'S SECOND SUPPLEMENTAL RESPONSE TO
REQUESTS FOR DISCOVERY CONCERNING EXPERT WITNESSES
FROM TENNESSEE AMERICAN WATER COMPANY**

Comes now, Intervenor City of Chattanooga and files the following responses to the request for discovery served by Petitioner Tennessee American Water Company ("Petitioner" or "TAWC").

DISCOVERY REQUEST NO. 2:

Identify each person whom you expect to call as an expert witness at any hearing in this docket, and for each such expert witness:

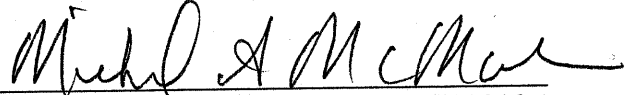
- (a) identify the field in which the witness is to be offered as an expert;
- (b) provide complete background information, including the expert's current employer as well as his or her educational, professional and employment history, and qualifications within the field in which the witness is expected to testify, and identify all publications written or presentations presented in whole or in part by the witness;

- (c) provide the grounds (including without limitation any factual bases) for the opinions to which the witness is expected to testify, and provide a summary of the grounds for each such opinion;
- (d) identify any matter in which the expert has testified (through deposition or otherwise) by specifying the name, docket number and forum of each case, the dates of the prior testimony and the subject of the prior testimony, and identify the transcripts of any such testimony;
- (e) identify for each such expert any person whom the expert consulted or otherwise communicated with in connection with his expected testimony;
- (f) identify the terms of the retention or engagement of each expert including but not limited to the terms of any retention or engagement letters or agreements relating to his/her engagement, testimony, and opinions as well as the compensation to be paid for the testimony and opinions;
- (g) identify all documents or things shown to, delivered to, received from, relied upon, or prepared by any expert witness, which are related to the witness(es)' expected testimony in this case, whether or not such documents are supportive of such testimony, including without limitation all documents or things provided to that expert for review in connection with testimony and opinions; and
- (h) identify any exhibits to be used as a summary of or support for the testimony or opinions provided by the expert.

RESPONSE: **Please see the pre-filed Direct Testimony of Marlin L. Mosby, Jr., filed on May 29, 2003.**

Respectfully submitted,

CITY OF CHATTANOOGA, TENNESSEE
RANDALL L. NELSON, CITY ATTORNEY

BY: 

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CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing document has been served on this the 9th day of June, 2003, upon the following:

- ☐ Hand
- ☒ Mail
- ☐ Facsimile
- ☐ Overnight

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